

Exhibit K

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JENNINGS, et al.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION NO. 2:21-CV-05400
	:	
CARVANA, LLC,	:	
	:	
Defendant.	:	
	:	
HARVIN, et al.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION NO. 2:23-CV-02068
	:	
CARVANA, LLC, et al.,	:	
	:	
Defendants.	:	
	:	

**PLAINTIFF JOSEPH FURLONG’S ANSWERS TO CARVANA LLC’S
FIRST SET OF INTERROGATORIES TO PLAINTIFF JOSEPH FURLONG**

INTERROGATORY NO. 1: Identify all persons with knowledge relevant to this Case, including but not limited to all persons you may call as a witness at any stage or proceeding in the Case.

RESPONSE: Plaintiff objects to this Interrogatory as premature because discovery is ongoing and any independent fact witnesses as well as Defendants (including any of their respective current or former directors, officers, managers, supervisors, employees, or agents) have not yet been deposed. Plaintiff objects to this Interrogatory as premature because Defendants have not yet produced any documents that may identify persons with knowledge of the allegations made in the Amended Consolidated Complaint (hereinafter “the Complaint”). My attorneys have not made a decision as to the persons who may be called as witnesses in this Case.

Subject to and without waiving the foregoing objection(s), Plaintiff refers Defendants to their Initial Disclosures and those Pennsylvania putative class members discussed in response to interrogatories herein.

INTERROGATORY NO. 18: Identify all communications from Carvana or anyone else requesting that you provide valid proof of insurance.

RESPONSE: May 21, 2021 (FURLONG 0014).

INTERROGATORY NO. 19: Identify all statements that any Defendant made to you promising that you would receive certificate of title by a date certain.

RESPONSE: Plaintiff refers propounding Defendants to his RISC with Carvana.

INTERROGATORY NO. 20: Identify all statements that any Defendant made to you promising that you would receive registration by a date certain.

RESPONSE: Plaintiff refers propounding Defendants to his RISC with Carvana.

INTERROGATORY NO. 21: Identify all documents relating to any vehicle purchase from Carvana since November 5, 2019, and any of the following individuals:

RESPONSE: Plaintiff objects to this request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, or any other rule of privilege or confidentiality provided by law. Subject to and without waiving the foregoing objection(s), I do not possess any documents concerning anyone other than myself. However, my attorneys produce the following documents subject to the same foregoing objections regarding the following Pennsylvania Carvana purchasers: [REDACTED]
[REDACTED].

Regarding [REDACTED]'s transaction in Georgia and [REDACTED]'s transaction in West Virginia, Plaintiff represents [REDACTED] and therefore objects to this request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, or any other rule of privilege or confidentiality provided by law. Regarding [REDACTED]'s West Virginia transaction and [REDACTED]'s Ohio transaction, Plaintiff is not seeking a national class and therefore objects to these requests to the extent it seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 22: Describe all information in your knowledge related to any vehicle purchase from Carvana since November 5, 2019, and any of the following individuals:

RESPONSE: See prior answer.